

FAEGRE DRINKER BIDDLE & REATH, LLP

Jeffrey S. Jacobson

Andrew B. Joseph

Kristen N. Roshto

600 Campus Drive

Florham Park, New Jersey 07932

(973) 549-7000

(973) 360-9831 (fax)

Jeffrey.Jacobson@faegredrinker.com

Andrew.Joseph@faegredrinker.com

Kristen.Roshto@faegredrinker.com

Attorneys for Rutgers, The State University of New Jersey, et al.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHILDREN'S HEALTH DEFENSE, INC.,
PETER CORDI, RAELYNNE MILLER,
KAYLA MATEO, ADRIANA PINTO, JAKE
BOTHE, AND DOES 1-13,

Plaintiffs,

v.

RUTGERS, THE STATE UNIVERSITY OF
NEW JERSEY, BOARD OF GOVERNORS,
RUTGERS SCHOOL OF BIOMEDICAL
AND HEALTH SCIENCES, CHANCELLOR
BRIAN L. STROM, PRESIDENT
JONATHAN HOLLOWAY, in their official
capacities,

Defendants.

Civil Action No. 3:21-cv-15333-ZNQ-TJB

Civil Action

(Document Filed Electronically)

**STIPULATION AND PROPOSED
ORDER**

It is hereby stipulated and agreed by and between the attorneys for Plaintiffs Children's Health Defense, Inc., Peter Cordi, Raelynne Miller, Kayla Mateo, Adriana Pinto, Jake Bothe, and

Does 1-13 ("Plaintiffs"), and Defendants Rutgers, The State University of New Jersey, Board of Governors, Rutgers, School of Biomedical and Health Sciences, Chancellor Brian L. Strom, and President Jonathan Holloway ("Defendants") that Plaintiffs will file an amended complaint by **October 19, 2021**.

The parties also propose the following briefing schedule for Defendants' anticipated motion to dismiss the amended complaint:

1. Defendants will file the motion to dismiss by **November 19, 2021**;
2. Plaintiffs will oppose the motion to dismiss by **December 31, 2021**;
3. Defendants will reply to Plaintiffs' opposition by **January 14, 2022**.

Separately, Defendants anticipate filing a motion requiring any and all "Doe" plaintiffs to comply with Fed. R. Civ. P. 10(a) (*i.e.*, to sue in their real names). That motion is unaffected by this stipulation and will be briefed in the regular course.

GOMEZ LLC ATTORNEY AT LAW

By: /s/


Julio C. Gomez

**FAEGRE DRINKER BIDDLE & REATH,
LLP**

By: /s/ Jeffrey S. Jacobson

Jeffrey S. Jacobson

Dated: October 6, 2021

Dated: October 6, 2021

SO ORDERED this ____ day of ____, 2021.

Hon.